

1 Amy F. Sorenson
Nevada Bar No. 12495
2 Erica J. Stutman
Nevada Bar No. 10794
3 Holly E. Cheong
Nevada Bar No. 11936
4 Snell & Wilmer L.L.P.
3883 Howard Hughes Parkway, Suite 1100
5 Las Vegas, NV 89169
Telephone: (702) 784-5200
6 Facsimile: (702) 784-5252
Email: asorenson@swlaw.com
7 estutman@swlaw.com
hcheong@swlaw.com
8 *Attorneys for Defendants Wells Fargo Bank, N.A. and*
U.S. Bank National Association
9

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 MICHAEL HILL,

13 Plaintiff,

14 vs.

15 WELLS FARGO BANK, N.A., a foreign
16 corporation; U.S. BANK NATIONAL
ASSOCIATION, a foreign corporation; MTC
17 FINANCIAL, INC. dba TRUSTEE CORPS, a
foreign corporation; and DOES I through 10,
18 and ROE CORPORATIONS 1 through 10,

19 Defendants.
20

CASE NO.: 2:18-cv-01350-MMD-PAL

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE
OPPOSITION TO PARTIAL MOTION
TO DISMISS AMENDED
COMPLAINT AND REPLY IN
SUPPORT OF PARTIAL MOTION TO
DISMISS AMENDED COMPLAINT
(FIRST REQUEST)**

21 Plaintiff Michael Hill ("Plaintiff"), by and through his undersigned counsel of record, the
22 law firm of Bowen Law Offices, and Defendants Wells Fargo Bank, N.A. and U.S. Bank National
23 Association (collectively "Defendants"), by and through their undersigned counsel of record, the
24 law firm of Snell & Wilmer L.L.P., hereby stipulate and request an order from the Court to extend
25 the filing deadline for Plaintiff's opposition to Defendants' Partial Motion to Dismiss Amended
26 Complaint filed on March 8, 2019 (ECF No. 57) and Defendants' reply in support of the same
27 Motion. This is the first stipulation for an extension of time regarding Defendants' Partial Motion
28 to Dismiss.

1 Currently, Plaintiff's opposition to Defendants' Partial Motion to Dismiss is due no later
2 than March 22, 2019 (ECF No. 57). Plaintiff and Defendants request a seven (7) day extension of
3 time, up to and including, March 29, 2019, for Plaintiff to file his opposition. Plaintiff requires
4 additional time to complete his research to support his opposition.

5 If the extension is granted, Defendants' reply in support of their Partial Motion to Dismiss
6 will be due April 12, 2019. Plaintiff and Defendants also request a seven (7) day extension of
7 time, up to and including, April 19, 2019, for Defendants to file their reply. Defendants also
8 anticipate needing additional time to complete research and client review of the reply.

9 IT IS STIPULATED AND AGREED by and between Plaintiff and Defendants that
10 Plaintiff shall have up to and including March 29, 2019, to file his opposition to Defendants'
11 Partial Motion to Dismiss and Defendants shall have up to and including April 19, 2019, to file
12 their reply in support of Defendants' Partial Motion to Dismiss (ECF No. 57).

13
14 DATED this 21st day of March, 2019

DATED this 21st day of March, 2019

15 By: /s/ Brandon J. Trout

16 Jerome R. Bowen, Esq.
17 Nevada Bar No. 4540
18 Brandon J. Trout, Esq.
19 Nevada Bar. No. 13411
20 Bowen Law Offices
21 9960 W. Cheyenne Ave., Suite 250
22 Las Vegas, Nevada 89129
23 Telephone: (702) 240-5191
24 Facsimile: (702) 240-5797
25 *Attorneys for Plaintiff*

By: /s/ Holly E. Cheong

Amy F. Sorenson, Esq.
Nevada Bar No. 12495
Erica J. Stutman, Esq.
Nevada Bar No. 10794
Holly E. Cheong, Esq.
Nevada Bar No. 11936
Snell & Wilmer, L.L.P.
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169
Telephone: (702) 784-5200
Facsimile: (702) 784-5252
Attorneys for Wells Fargo Bank, N.A.

26
27
28
IT IS SO ORDERED.



DISTRICT COURT JUDGE

DATED: March 25, 2019

1 **CERTIFICATE OF SERVICE**

2 I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen
3 (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be
4 served a true and correct copy of the foregoing **STIPULATION AND ORDER TO EXTEND**
5 **TIME TO FILE OPPOSITION TO PARTIAL MOTION TO DISMISS AMENDED**
6 **COMPLAINT AND REPLY IN SUPPORT OF PARTIAL MOTION TO DISMISS**
7 **AMENDED COMPLAINT** by the method indicated:

8 _____ U.S. Mail
9 _____ U.S. Certified Mail
10 _____ Facsimile Transmission
11 _____ Overnight Mail
12 _____ Federal Express
13 _____ Hand Delivery
14 X Electronic Filing

15
16 and addressed to the following:

17 Jerome R. Bowen, Esq.
18 Brandon J. Trout, Esq.
19 Bowen Law Offices
20 9960 W. Cheyenne Ave., Suite 250
21 Las Vegas, NV 89129
22 *Attorneys for Plaintiff Michael Hill*

23 Dated: March 21, 2019

24 /s/ Maricris Williams
25 An Employee of Snell & Wilmer L.L.P.

26
27 4841-4843-4317
28